Case 1:02-cv-03878-AMD Do**lssued** by the Filed 07/17/2003

UNITED STATES DISTRICT COURT

Mi	nn	es	ot	ā
----	----	----	----	---

DIST	TRIC	T OF	

EXHIBIT

Russian Research Center The Kurchatov Institute

Western Services Corporation

SUBPOENA IN A CIVIL CASE'

CASE NUMBER: 1 AMD 02 CV 3878 (Pending in the United States District Court for the District of Maryland)

Page 1

Cou.	te for the bistrict of Maryland,
Custodian of Record	•
TO: Xcel Energy Corporation p/k/a Northern States Powe	r
Sherburne County Generating Station	
l3999 Industrial Blvd.	
YOU ARE COMMANDED to appear in the United States District Court at the	place, date, and time specified below to testify in
the above case.	,
PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME
	DATE AND TIME
YOU ARE COMMANDED to appear at the place, date, and time specified to	pelow to testify at the taking of a deposition in the
above case.	, , , , , , , , , , , , , , , , , , , ,
DI ACE DE DEPOSITION	TOATE AND TIME
	4
YOU ARE COMMANDED to produce and permit inspection and copying or	the following documents or objects at the place.
date, and time specified below (list documents or objects):	in the following documents of objects at the place,
date, and time specified below (list documents of objects).	•
See Schedule A attached hereto.	
PLACE Ober, Kaler, Grimes & Shriver	DATE AND TIME
120 E. Baltimore Street	06/1 6 /03 - 10:00 a.m.
Baltimore, MD 21202-1643	
YOU ARE COMMANDED to permit inspection of the following premises a	at the date and time specified below.
PREMISES	DATE AND TIME
rnemises	DATE AND TIME
A constant to the second of th	- 4
Any organization not a party to this suit that is subpoensed for the taking of	·
directors, or managing agents, or other persons who consent to testify on	•
designated, the matters on which the person will testify. Federal Rules of Civ	ril Procedure, 30(b)(6).
ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
// M/ in land	5/16/03
SUING OFFICER'S NAME ADDRESS AND PHONE NUMBER	1/19
John W.G. Murchy Esq. Dorr Kaler, Grimes & Shriver	/ '
120 E. Baltimore Street, Baltimore, MD 21202-1643	410-347-7334
THE B. DOILLINGTE DELECT DUTCHNOLE, LID STSON 1043	310-031-1003

- 1. All versions of SIMPORT (as defined above) in the possession, custody or control of XCEL ENERGY CORPORATION F/K/A NORTHERN STATES POWER, in each format that such versions are retained.
- 2. All memos, email, correspondence, notes and other documents referring to, relating to or reflecting the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts.
- 3. All documents, agreements or contracts between XCEL ENERGY CORPORATION F/K/A NORTHERN STATES POWER and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
- 4. All documentation supporting any joint funding activity by XCEL ENERGY CORPORATION F/K/A NORTHERN STATES POWER in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
- 5. All documentation related to any payments made by XCEL ENERGY CORPORATION F/K/A NORTHERN STATES POWER to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

Case 1:02-cv-03878-AMD Document by the Filed 07/17/2003 Page 3 of 24 UNITED STATES DISTRICT COURT

DISTRICT OF	western bistrict of Femisyrvania
Russian Research Center	
The Kurchatov Institute	CURROTENIA INI A CINIII CACEI
V	SUBPOENA IN A CIVIL CASE'
Western Services Corporation	CASE NUMBER: 'AMD 02 CV 3878 (Pending in the United States District Court for the District of Maryland)
Custodian of Record Allegheny Energy Supply Company LLC Armstrong Generating Station P.O. Box 729 Kittanning, PA 16201 YOU ARE COMMANDED to appear in the United States District County	irt at the place, date, and time specified below to testify in
the above case.	
PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME
YOU ARE COMMANDED to appear at the place, date, and time speabove case.	
DI ACE DE DEDISTIMA	DATE AND TIME
	.4
YOU ARE COMMANDED to produce and permit inspection and co date, and time specified below (list documents or objects): See Schedule A attached hereto.	pying of the following documents or objects at the place,
PLACE Ober, Kaler, Grimes & Shriver 120 E. Baltimore Street Baltimore, MD 21202-1643	DATE AND TIME 06/1 5 /03 - 10:00 a.m.
YOU ARE COMMANDED to permit inspection of the following pre	mises at the date and time specified below.
PREMISES	DATE AND TIME
Any organization not a party to this suit that is subpoenaed for the tall directors, or managing agents, or other persons who consent to te designated, the matters on which the person will testify. Federal Rule	stify on its behalf, and may set forth, for each person s of Civil Procedure, 30(b)(6).
ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	5/W/03
Suing officers Name Address and PHONE NUMBER John M.G. Murphy Esq. Ber, Kaler, Grimes & Shriver	
120 E. Baltimore Street, Baltimore, MD 21202-1643	410-347-7334
(See Rule 45, Federal Rules of CMI Procedure If action is pending in district other than district of issuance, state district under case	•

- 1. All versions of the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts (hereinafter "SIMPORT"), in the possession, custody or control of ALLEGHENY ENERGY SUPPLY COMPANY LLC or any successor, predecessor or subsidiary, in each format that such versions are retained.
- 2. All memos, email, correspondence, notes and other documents referring to, reflecting or relating to SIMPORT as defined above.
- 3. All documents, agreements or contracts between ENERGY ALLEGHENY SUPPLY COMPANY LLCand Science Applications International Corporation ("SAIC"), Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
- 4. All documentation supporting any joint funding activity by ALLEGHENY ENERGY SUPPLY COMPANY LLC in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
- 5. All documentation related to any payments made by ALLEGHENY ENERGY SUPPLY COMPANY LLC to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

PLACE OF TESTIMONY

Issued by the United States District Court

75	CTD	7/~7	20
IJ	STR	36.	UI

Columbia.

Russian Research Center The Kurchatov Institute

SUBPOENA IN A CIVIL CASE

Western Services Corporation

Case Number: AMD 02 CV 3878

(Pending in the United States District (bns

COURTROOM

		(LEHGTHD: TH. CHE CHEEK CANCEL ATTRACT
TO	D: ~ Custodian of Record	Court for the District of Maryland)
	Electric Power Research Institute	
	2000L Street, N.W., Ste. 805	
	Washington, D. C. 20036 YOU ARE COMMANDED to appear in the United State	. Priming and as the place data and time manified below
	YOU ARE COMMANDED to appear in the United State	2 District court at the biace, date, and thus specified perow
	tartify in the shove case.	

		DATE WAT INVE
	YOU ARE COMMANDED to appear at the place, date, and time specified below to te in the above case.	stify at the taking of a deposition
PLA		DATE AND TIME

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Schedule A attached hereto.

PLACE Ober, Kaler, Grimes & Shriver	DATE AND TIME
120 E. Baltimore Street	06/09/03 - 10:00 a.m.
D YOU ARE COMMANDED to permit inspection of the following premises at t	the date and time specified below.
PREMISES	DATE AND TIME

Any organization not a party to this suit that is subposensed for the taking of a deposition shall designate one or more officers. directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the maners on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

Mr (1990) at Alban are heart and	
ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE LE AFFORNEY FOR PLAINTIFF OR DEFENDANT)	05/08/02
John M.G. Murphy, Beq. Ober, Kaler, Grimes & Shriver 120 E. Baltimore Street, Baltimore, MD 21202-1643	0-347-1334
120 Et Ballamore and and and and and and	

(See Rule 45, Fortern) Rules of Crost Proceedure, Petro C & D so near page)

If action is pending in district other than district of utuation, time district under case mamber.

PROOF OF SERVICE DATE May 9, 2003 1025 Vermont Avenue NW 4th Floor SERVED Washington, DC 20005 at 10:23 am SERVED ON (PRINT NAME) MANNER OF SERVICE Robin Brown, Authorized Representative CT Corporation System, Registered Agent personal SERVED BY (PRINT NAME) TITLE Kirk A. Hornbeck private process server **DECLARATION OF SERVER** I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

_____May 9, 2003

Executed on .

SIGNATURE OF SERVER

ADDRESS OF SERVER

Sule 45, Federal Rules of Civil Procedure, Parts C & D:

DATE

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

- [1] A party or an attorney responsible for the issuance and service of a subpoens shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoens. The court on benalf of which the subpoens was issued shall enforce this duty and empose upon the party or attorney in breach of this duty an appropriate sanction which may include, but is not limited to, lost earnings and reasonable attorney's fee.
- (2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.
- (B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoens or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoens written objection to inspection or copying of any or all of the designated materials or of the premises, if objection is made, the party serving the subpoens shall not be entitled to inspect and copy materials or inspect the premises except pursuant to an order of the court by which the subpoens was issued, if objection has been made, the party serving the subpoens may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense regulting from the inspection and copying commanded.
- (3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it
- (I) falls to allow reasonable time for compliance:

 (ii) requires a person who is not a party or an officer of a paint; to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in

person, except that, subject to the provisions of clause (c) (3) (B) (iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or matter and in exception or waiver applies, or (iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or (ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena, or. If the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

- (1) A person responding to a subpoent to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.
- (2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to comest the claim.

Case 1:02-cv-03878-AMD Document by the Filed 07/17/2003 Page 7 of 24 UNITED STATES DISTRICT COURT

Northern DISTRICT OF CALIFORNIA

Russian Research Center The Kurchatov Institute

SUBPOENA IN A CIVIL CASE'

V.	
Western Services Corporation	CASE NUMBER: AMD 02 CV 3878 (Pending in the United States District Court for the District of Maryland)
TO: Pacific Gas and Electric Company one market Spear Tower, suite 2400 San Francisco, C4 94105	
YOU ARE COMMANDED to appear in the United States the above case.	District Court at the place, date, and time specified below to testify in
PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME
YOU ARE COMMANDED to appear at the place, date, a above case.	and time specified below to testify at the taking of a deposition in the
DI BOE DE DEPOSITION	DATE AND TIME
date, and time specified below (list documents or objects See Schedule A attached hereto.	tion and copying of the following documents or objects at the place,):
PLACE Ober, Kaler, Grimes & Shriver	DATE AND TIME
120 E. Baltimore Street Baltimore, MD 21202-1643	6/16/03 10:00 a.m
	ollowing premises at the date and time specified below.
PREMISES	DATE AND TIME
	· // /
VSSUING/DFFICER'S NAME, ADDRESS AND PHONE NUMBER	
Dber, Kaler, Grimes & Shriver	
120 E. Baltimore Street, Baltimore, MD 212	202–1643 410–347–7334

If action is pending in district other than district of issuance, state district under case number.

SCHEDULE A

Documents or things to be produced

- 1. All versions of the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts (hereinafter "SIMPORT"), in the possession, custody or control of PACIFIC GAS AND ELECTRIC COMPANY, INC. ("PGE"), or any successor, predecessor or subsidiary, in each format that such versions are retained.
- 2. All memos, email, correspondence, notes and other documents referring to, reflecting or relating to SIMPORT as defined above.
- 3. All documents, agreements or contracts between PGE and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
- 4. All documentation supporting any joint funding activity by PGE in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
- 5. All documentation related to any payments made by PGE to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

Case 1:02-cv-03878-AMD Do**lemen** by the Filed 07/17/2003 Page 9 of 24 **UNITED STATES DISTRICT COURT**

SOUTHERN DISTRICT OF	ILLINOIS
Russian Research Center	
The Kurchatov Institute	
V	SUBPOENA IN A CIVIL CASE
Western Services Corporation	CASE NUMBER: 1 AMD 02 CV 3878
	(Pending in the United States District Court for the District of Maryland)
Custodian of Records	
TO: Electric Energy, Inc. 2100 Portland Road	·
Joppa, Illinois 62953	
YOU ARE COMMANDED to appear in the United States District Co	urt at the place, date, and time specified below to testify in
the above case.	I COURTROOM
PLACE OF TESTIMONY	COUNTROOM
	DATE AND TIME
YOU ARE COMMANDED to appear at the place, date, and time sp	ecified below to testify at the taking of a deposition in the
above case.	DATE AND TIME
YOU ARE COMMANDED to produce and permit inspection and codate, and time specified below (list documents or objects): See Schedule A attached hereto.	pying of the following documents or objects at the place,
PLACE Ober, Kaler, Grimes & Shriver 120 E. Baltimore Street Baltimore, MD 21202-1643	DATE AND TIME 06/15/03 - 10:00 a.m.
YOU ARE COMMANDED to permit inspection of the following pro	emises at the date and time specified below.
PREMISES	DATE AND TIME
Any organization not a party to this suit that is subpoensed for the to directors, or managing agents, or other persons who consent to to designated, the matters on which the person will testify. Federal Rule	stify on its behalf, and may set forth, for each person
ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
Guing OFFICER'S NAME ADDRESS AND PHONE NUMBER ON M.G. Murphy, Esq. ber, Kaler, Grimes & Shriver	
120 E. Baltimore Street, Baltimore, MD 21202-1643	410-347-7334

If action is pending in district other than district of issuance, state district under case number.

SCHEDULE A

Documents or things to be produced

- 1. All versions of the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts (hereinafter "SIMPORT"), in the possession, custody or control of ELECTRIC ENERGY, INC., or any successor, predecessor or subsidiary, in each format that such versions are retained.
- 2. All memos, email, correspondence, notes and other documents referring to, reflecting or relating to SIMPORT as defined above.
- documents, agreements or contracts 3. All INC., Science Applications ELECTRIC ENERGY, and Corporation ("SAIC"), Data Systems International Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
- 4. All documentation supporting any joint funding activity by ELECTRIC ENERGY, INC., in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
- 5. All documentation related to any payments made by ELECTRIC ENERGY, INC., to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

Case 1:02-cv-03878-AMD Document 45-6 Filed 07/17/2003 Page 11 of 24 UNITED STATES DISTRICT COURT

DISTRICT OF	Northern District of Texas
Russian Research Center	
The Kurchatov Institute	
THE RULCHALOV THECTCAGE	SUBPOENA IN A CIVIL CASE
V.	
Western Services Corporation	CASE NUMBER: 1 AMD 02 CV 3878
•	(Pending in the United States District
	Court for the District of Maryland)
Custodian of Record	
Texas Utilities Company, Inc.	•
TO: Energy Plaza	
1601 Byran Street	
Dallas, TX 75201	
YOU ARE COMMANDED to appear in the United States District Cou	rt at the place, date, and time specified below to testify in
the above case.	
PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME
YOU ARE COMMANDED to appear at the place, data, and time are	
YOU ARE COMMANDED to appear at the place, date, and time speabove case.	echied below to testify at the taking of a deposition in the
DI ACE OE OEDOSITION	DATE AND TIME
	A DATE AND TIME
	1
YOU ARE COMMANDED to produce and permit inspection and co	oving of the following documents or objects at the place
date, and time specified below (list documents or objects):	,g
See Schedule A attached hereto.	
PLACE Ober, Kaler, Grimes & Shriver	DATE AND TIME 06/16/03 - 10:00 a.m.
120 E. Baltimore Street	00/1 0 /03 - 10:00 a.m.
Baltimore, MD 21202-1643	
YOU ARE COMMANDED to permit inspection of the following pre-	mises at the date and time specified below.
PREMISES	DATE AND TIME
Any organization not a party to this suit that is subpoenaed for the tal	king of a deposition shall designate one or more officers.
directors, or managing agents, or other persons who consent to tes	stify on its behalf, and may set forth, for each person
designated, the matters on which the person will testify. Federal Rules	of Civil Procedure, 30(b)(6).
SSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	
	DATE
()/// 4/20	~/11/2x
SSUING OFFICER'S NAME, ADDRESS AND PRIONE NUMBER	13/40
ohp M.G. Mupphy, Esq.	/ /
MR Raltimore Street Baltimore MD 21202 1642	410 247 7224
20 E. Baltimore Street, Baltimore, MD 21202-1643 (See Rule 45. Federal Rules of CMI Procedure.)	410-347-7334
1 (See Truite 42, receits) Hules of CIMI Procedure.	rans C a C On Meverse)

If action is pending in district other than district of issuance, state district under case number.

SCHEDULE A

Documents or things to be produced

- 1. All versions of SIMPORT (as defined above) in the possession, custody or control of TEXAS UTILITIES COMPANY INC. ("TEXAS UTILITIES"), in each format that such versions are retained.
- 2. All memos, email, correspondence, notes and other documents referring to, relating to or reflecting the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts.
- 3. All documents, agreements or contracts between TEXAS UTILITIES and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
- 4. All documentation supporting any joint funding activity by TEXAS UTILITIES in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
- 5. All documentation related to any payments made by TEXAS UTILITIES to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

Issued by the

Case 1:02-cv-0387	8-AMD D UNITED S	ocument 45-6 TATES DISTI	RICT COURT 03	Page 13 of 24
,	EASTERN	DISTRICT OF	NORTH CAROLI	NA
Russian Research Center The Kurchatov Institute			SUBPOENA IN	A CIVIL CASE
Western Services Corpor	ation		CASE NUMBER: AMD (Pending in the Court for the I	02 CV 3878 United States District District of Maryland)
Custodian of Records Progress Energy, Inc. P.O. Box 1551 Raleigh, NC 27602-15			• •	•
YOU ARE COMMANDED to ap	pear in the Unit	ed States District Co	urt at the place, date, and	d time specified below to testify in
PLACE OF TESTIMONY				COURTROOM
				DATE AND THAE
YOU ARE COMMANDED to apabove case.	pear at the pla	ce, date, and time s	becified below to testify	at the taking of a deposition in the
YOU ARE COMMANDED to produce, and time specified below (III	st documents (or objects):	opying of the following o	locuments or objects at the place.
PLACE Ober, Kaler, Grimes 120 E. Baltimore Str Baltimore, MD 21202				6/30/03 /0:00 av
YOU ARE COMMANDED to p		n of the following p	remises at the date and	time specified below.
PREMISES	· .			DATE AND TIME
	or other persor	s who consent to	testify on its behalf, an	nall designate one or more officers ad may set forth, for each person 10(b)(5).
ISSUING OFFICER/SIGNATURE AND TITLE (INDICATE	F ATTORNEY FOR PLA	INTIFF OR DEFENDANT)		DATE

Ohn M.G. MUTDIV, E. Shriver Ober Kaler, Grimes Shriver 120 E. Baltimore Street, Balt Baltimore, MD 21202-1643 (See Rule 45, Federal Rules of Chill Procedure: Parts C & D nn Reverse) If action is pending in district other than district of sequence, state district under case number.

- 1. All versions of SIMPORT (as defined above) in the possession, custody or control of TENNESSEE VALLEY AUTHORITY, in each format that such versions are retained.
- 2. All memos, email, correspondence, notes and other documents referring to, relating to or reflecting the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts.
- 3. All documents, agreements or contracts between TENNESSEE VALLEY AUTHORITY and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
- 4. All documentation supporting any joint funding activity by TENNESSEE VALLEY AUTHORITY in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
- 5. All documentation related to any payments made by TENNESSEE VALLEY AUTHORITY to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

Case 1:02-cv-03878-AMD

Document 45 6 Filed 07/17/2003

Page 15 of 24

EASTERN DISTRICT OF -

Russian Research Center The Kurchatov Institute

TO:

Western Services Corporation

SUBPOENA IN A CIVIL CASE'

CASE NUMBER: 1 AMD 02 CV 3878 (Pending in the United States District Court for the District of Maryland)

Custodian of Records Tennessee Valley Authority 400 West Summit Hill Drive Knowsille, TN 37902

THE ADOVE CASE.	СОИНТИООМ
	DATE AND TIME
YOU ARE COMMANDED to appear at the place, date, and time specifiabove case.	
म भिन्न एक प्रमुक्तासाम्बर्ग	TOATE ANIGHTME
See Schedule A attached hereto. PLACE Ober, Kaler, Grimes & Shriver	DATE AND TIME 6/80/03 /0:00 0)
120 E. Baltimore Street Baltimore, MD 21202-1643	6188183 10.00 01
YOU ARE COMMANDED to permit inspection of the following premi	ses at the date and time specified below.
PREMISES	DAYÉ AND TIME
Any organization not a party to this suit that is subposed for the taking directors, or managing agents, or other persons who consent to testiful designated, the finatters on which the person will testify. Federal Rules of	ty on its behalf, and may set forth, for each person
ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
11 RC	
ISSUND OFFICER'S NAME ACCRESS AND FICHE NUMBER John M.G. Murphy, Esq. Ober, Kaler, Grimes & Shriver	
120 £. Baltimore Street, Baltimore, MD 21202-1643	410-347-7334

1 It action is pending in district other than district of issuance, state district under case number.

- 1. All versions of SIMPORT (as defined above) in the possession, custody or control of PROGRESS ENERGY, INC., in each format that such versions are retained.
- 2. All memos, email, correspondence, notes and other documents referring to, relating to or reflecting the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts.
- 3. All documents, agreements or contracts between PROGRESS ENERGY, INC., and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
- 4. All documentation supporting any joint funding activity by PROGRESS ENERGY, INC., in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
- 5. All documentation related to any payments made by PROGRESS ENERGY, INC., to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

Case 1:02-cv-03878-AMD Document 45/6^{the} Filed 07/17/2003 Page 17 of 24 UNITED STATES DISTRICT COURT

		- DISTRICT OF	Southern Dist	rict of Georgia
Russia	n Research Center			
	rchatov Institute			
			SUBPOENA IN A	CIVIL CASE'
· 12] t	V.		1	eu 0000
wester	n Services Corporation		CASE NUMBER: AMD 02	CV 3878 lited States District
				trict of Maryland)
	Controling of Donnel			cerce or maryiano,
	.Custodian of Record Southern Company			-
TO:	270 Peachtree Street, N.W.			
	Atlanta, GA 30303			
	ARE COMMANDED to appear in the United	States District Co	urt at the place, date, and tin	ne specified below to testify in
the above	C88e.			
PLACE OF TEST	IMONY			COURTROOM
				DATE AND TIME
				DATE AND TIME
L YOUA	ARE COMMANDED to appear at the place,	date, and time sp	ecified below to testify at the	e taking of a deposition in the
above cas	38.			
DI BÜE UE UEDL	эрги			DATE AND TIME
date, and	ARE COMMANDED to produce and permit time specified below (list documents or of Schedule A attached hereto.	inspection and co bjects):	pying of the following docu	ments or objects at the place
PLACE Ohe	2.1			DATE AND TIME
ODE.	r, Kaler, Grimes & Shriver E. Baltimore Street			06/16/03 - 10:00 a.m
	timore, MD 21202-1643			
		4 Abo 4 - Marriago and		: (i - + h - l
100 A	NRE COMMANDED to permit inspection o	the following pro	emises at the date and tim	e specified below.
PREMISES				DATE AND TIME
				<u> </u>
directors,	ganization not a party to this suit that is sub or managing agents, or other persons w d, the matters on which the person will te	tho consent to te	stify on its behalf, and m	ay set forth, for each person
ISSUING OFFICE	SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF	OR DEFENDANT)		DATE
	W/			1 4/1/2
_ (V	1. lmely			1/1603
Ohn W	as name anches and phone number G. Murchy, Esq. aler, Grimes a Shriver			77
	Baltimo <i>re</i> Street, Baltimore, M	D 21202-1643	410-347-	7334
<u> </u>		~ ~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~	71U-J4/ -	, JJ7

(See Rule 45, Federal Rules of CMI Procedure, Parts C & D on Reverse)

engan kelabahan mendidi kendidi kelanda berangan kelanda kelanda kelanda kelanda kelanda kelanda kelanda kelanda

If action is pending in district other than district of issuance, state district under case number.

- 1. All versions of the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts (hereinafter "SIMPORT"), in the possession, custody or control of SOUTHERN COMPANY or any successor, predecessor or subsidiary, in each format that such versions are retained.
- 2. All memos, email, correspondence, notes and other documents referring to, reflecting or relating to SIMPORT as defined above.
- 3. All documents, agreements or contracts between SOUTHERN COMPANY and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
- 4. All documentation supporting any joint funding activity by SOUTHERN COMPANY in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
- 5. All documentation related to any payments made by SOUTHERN COMPANY to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

Case 1:02-cv-03878-AMD Dodssued by the Filed 07/17/2003 Page 19 of 24

UNITED STATES DISTRICT COURT

	DISTRICT OF	Southern District of Georgia
Russia	n Research Center	
The Ku	rchatov Institute	CURROTTIA IN A CHIEF CACE
	V.	SUBPOENA IN A CIVIL CASE'
.Wester	n Services Corporation	CASE NUMBER: 1 AMD 02 CV 3878 (Pending in the United States District Court for the District of Maryland)
TO:	Custodian of Record Georgia Power 241 Ralph McGill Boulevard, N.E. Atlanta, GA 30308	•
YOU A	RE COMMANDED to appear in the United States District Co	rurt at the place, date, and time specified below to testify
PLACE OF TESTI		COURTROOM
		DATE AND TIME
above cas		
םו שניב טב טבפט	SITION	DATE AND TIME
		4
See	RE COMMANDED to produce and permit inspection and clime specified below (list documents or objects): Schedule A attached hereto. C, Kaler, Grimes & Shriver E. Baltimore Street	opying of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects at the place of the following documents or objects or objects or objects of the following documents or objects at the place of the following documents or objects or o
Bali	imore, MD 21202-1643	
YOU A	RE COMMANDED to permit inspection of the following po	remises at the date and time specified below.
PREMISES		DATE AND TIME
designated ISSUING OFFICER JUING OFFICER JOHN M. C.	ganization not a party to this suit that is subpoensed for the for managing agents, or other persons who consent to the matters on which the person will testify. Federal Rules substantial indicate if attorney for Plaintiff or Defendant. Shalf adoless and those number of Murphy, bag. Shriver Baltimore Street Raltimore MD 21202-1643	estify on its behalf, and may set forth, for each personal of Civil Procedure, 30(b)(6).
120.5.	Baltimoré Street, Baltimore, MD 21202-1643 (See Rule 45, Federal Rules of Chil Procedu	
VI action is	nanding in district other than district of less some atota district comes on	

- 1. All versions of the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts (hereinafter "SIMPORT"), in the possession, custody or control of GEORGIA POWER or any successor, predecessor or subsidiary, in each format that such versions are retained.
- 2. All memos, email, correspondence, notes and other documents referring to, reflecting or relating to SIMPORT as defined above.
- 3. All documents, agreements or contracts between GEORGIA POWER and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
- 4. All documentation supporting any joint funding activity by GEORGIA POWER in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
- 5. All documentation related to any payments made by GEORGIA POWER to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

Case 1:02-cv-03878-AMD Document 45 6 the Filed 07/17/2003 Page 21 of 24 UNITED STATES DISTRICT COURT

DISTRICT OF	Vermont
Russian Research Center	
The Kurchatov Institute	
	SUBPOENA IN A CIVIL CASE'
Western Services Corporation	CASE NUMBER: AMD 02 CV 3878 (Pending in the United States District Court for the District of Maryland)
Custodian of Record Vermont Yankee Nuclear Power Corporation RD 5, Box 169 Ferry Road Brattleboro, VT 53010	
YOU ARE COMMANDED to appear in the United States District Couthe above case.	rt at the place, date, and time specified below to testify in
PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME
YOU ARE COMMANDED to appear at the place, date, and time speabove case.	TOATE AND TIME
YOU ARE COMMANDED to produce and permit inspection and co date, and time specified below (list documents or objects): See Schedule A attached hereto.	pying of the following documents or objects at the place
PLACE Ober, Kaler, Grimes & Shriver 120 E. Baltimore Street Baltimore, MD 21202-1643	DATE AND TIME 06/16/03 - 10:00 a.m
YOU ARE COMMANDED to permit inspection of the following pre	mises at the date and time specified below.
PREMISES	DATE AND TIME
Any organization not a party to this suit that is subpoenaed for the ta directors, or managing agents, or other persons who consent to te designated, the matters on which the person will testify. Federal Rule: SSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT) SSUING OFFICER SHAME ADDRESS AND FYONE NUMBER ONLY MULT DITY, LOG -	stify on its behalf, and may set forth, for each person
Doer, Kaler, Grimes & Shriver	/ /
120/R. Baltimore Street, Baltimore, MD 21202-1643	410-347-7334

(See Rule 45, Federal Rules of Civil Procedure, Paris C & D on Reverse)

If action is pending in district other than district of issuance, state district under case number.

- 1. All versions of the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts (hereinafter "SIMPORT"), in the possession, custody or control of VERMONT YANKEE NUCLEAR POWER CORPORATION, in each format that such versions are retained.
- 2. All memos, email, correspondence, notes and other documents referring to, reflecting or relating to SIMPORT as defined above.
- 3. All documents, agreements or contracts between VERMONT YANKEE NUCLEAR POWER CORPORATION and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
- 4. All documentation supporting any joint funding activity by VERMONT YANKEE NUCLEAR POWER CORPORATION in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
- 5. All documentation related to any payments made by VERMONT YANKEE NUCLEAR POWER CORPORATION to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.

Issued by the
Document 45-6 Filed 07/17/2003 Page 23 of 24
ED STATES DISTRICT COURT

	DISTRICT O	OF NEW HAMPSHIRE
Rus	ssian Research Center	
The	e Kurchatov Institute	
	·	SUBPOENA IN A CIVIL CASE
	V.	1
wes	stern Services Corporation	CASE NUMBER: AMD 02 CV 3878 (Pending in the United States District Court for the District of Maryland)
TO:	Custodian of Records North Atlantic Energy Corporation 1000 Elm Street Manchester, NH 03105	•
	OU ARE COMMANDED to appear in the United States District (bove case.	Court at the place, date, and time specified below to testify in
PLACE C	OF TESTIMONY	COURTROOM
		DATE AND TIME
		L
	OU ARE COMMANDED to appear at the place, date, and time	specified below to testify at the taking of a deposition in the
	B C886.	CATE AND TIME
		1 /alle and I muc.
5		· †
date,	and time specified below (list documents or objects): See Schedule A attached hereto.	d copying of the following documents or objects at the place,
PLACE	Ober, Kaler, Grimes & Shriver	DATE AND TIME
	120 E. Baltimore Street	06/26/03
	Baltimore, MD 21202-1643	10:00 a.m.
∐ Y	OU ARE COMMANDED to permit inspection of the following	premises at the date and time specified below.
PREMISE	S	DATE AND TIME
direct	•	ne taking of a deposition shall designate one or more officers, o testify on its behalf, and may set forth, for each person Rules of Civil Procedure, 30(b)(6).
SSUING	OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE
		$ S _{22}/a_2$
SUING	officers name aconess and phone Nomber M.G. Murphy, Esq. , Kaler, Grimes a Shriver	
	E. Baltimore Street, Baltimore, MD 21202-16	543 410-347-7334
	CTHASE NOTICE I DOTCIMOLE! UN SISOS-IO	,,,,

If action is pending in district other than district of issuance, state district under case number.

- 1. All versions of SIMPORT (as defined above) in the possession, custody or control of NORTH ATLANTIC ENERGY CORPORATION, in each format that such versions are retained.
- 2. All memos, email, correspondence, notes and other documents referring to, relating to or reflecting the simulation software known as AIS '95 or SIMPORT, including any past or current versions, components or constituent parts.
- 3. All documents, agreements or contracts between NORTH ATLANTIC ENERGY CORPORATION and Science Applications International Corporation ("SAIC"), Data Systems and Solutions ("DS&S") and/or Western Services Corporation ("Western") or their agents, or any other person or company regarding the development, marketing, demonstration, sale, use and/or licensing of SIMPORT or any simulation software, as well as any prior or subsequent version, adaptation, component or constituent part thereof.
- 4. All documentation supporting any joint funding activity by NORTH ATLANTIC ENERGY CORPORATION in which SIMPORT or any simulation software was provided by SAIC, DS&S and/or Western, or any of their agents or representatives.
- 5. All documentation related to any payments made by NORTH ATLANTIC ENERGY CORPORATION to SAIC, DS&S and/or Western, or any of their employees, contractors or other agents since 1994.